August 16, 2005

Arthur Neal, Director, Program Administration
National Organic Program
USDA–AMS—TMP–NOP
1400 Independence Ave., SW., Room 4008
So. Ag Stop 0268
Washington, DC 20250

Via E-mail: National.List@usda.gov
Via Fax: (202) 205–7808

Dear Mr. Neal,

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

Global Organics, Ltd. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material:

Lecithin - unbleached, as found in National List Section § 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." This substance is used as an emulsifier in the production of organic chocolate.

Global Organics is a handler of organic chocolate products consisting of milk chocolate, semi-sweet chocolate and dark chocolate in a wide range forms from 8,000 count chips (chips/pound) to 10 kilogram blocks. All of our chocolate is made to order by an organic chocolate factory in Europe.

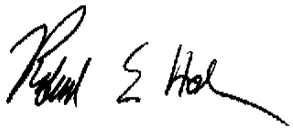
Unbleached lecithin is a key ingredient in the production of chocolate, organic as well as non-organic. Despite being a very small percentage of the formulation, lecithin has an important technical function to reduce viscosity of the chocolate in process. Lower viscosity influences the dispersion of the fat molecules and ultimately the "mouth-feel" in the finished chocolate.

Although we are aware that organic lecithin (unbleached) has been produced, after running tests the producer of our organic chocolate has found the quality and characteristics of that organic lecithin is not suitable. As with many food ingredients, there are many different types of lecithin, each providing specific functionalities in the formulation of the final product. The organic lecithin currently available is not the specific type required to produce chocolate. At this time there is no suitable organic alternative to the natural, non-GM lecithin (unbleached) that is currently being used. Therefore, it is essential that lecithin (unbleached) be kept on the National List Section § 205.606.

We would like to add, however, that as has been the case with many organic ingredients, the development process is lengthy and in the case of organic lecithin is in the early stages. We encourage the producers to continue their efforts so that at some point organic lecithin of suitable quality can and will be used instead of non-organic.

Nevertheless, the mere existence of some form of organic lecithin is not sufficient justification to disallow the use of non-organically produced lecithin as listed in Section § 205.606. Its removal would cause great harm to the overall organic chocolate industry as well as the many users of organic chocolate ingredients.

Sincerely,



Roland E. Hoch
Vice President

cc: Organic Trade Association
National Organic Standards Board

P.O. Box 272 Arlington, MA 02474-5103 USA Phone 781 648-8844 FAX: (781) 648-0774 www.global-organics.com

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Perlite, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." Perlite is used as a filtering aid in the production of organic syrup sweeteners.

Global Organics is a handler of wholesale organic ingredients and distributes a full line of organic syrups made from organic tapioca starch, wheat starch, rice starch, malted barley starch, corn starch, spelt starch and organic cane sugar. Perlite is used in the production of our organic IMO tapioca syrup and our organic wheat syrups.

Perlite is the most suitable non-synthetic, natural filtering aid that is used to remove certain impurities from organic syrup sweeteners. There is no suitable natural or organic alternative filtering aid that provides same filtering function in the production of the organic syrup products listed above.

Without perlite, those organic syrup sweeteners and all the organic products made with them could not be produced. Perlite should remain on the National List under Section § 205.605 as an ingredient allowed in or on processed products labeled as "organic."

Sincerely,

Roland E. Hoch
Vice President

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Global Organics, Ltd. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material:

Bentonite, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." Bentonite is used as a filtering aid in the production of organic syrup sweeteners.

Global Organics is a handler of wholesale organic ingredients and distributes a full line of organic syrups made from organic tapioca starch, wheat starch, rice starch, malted barley starch, corn starch, spelt starch and organic cane sugar. Bentonite is used in the production of our organic IMO tapioca syrup and our organic wheat syrups.

Bentonite is a naturally occurring mineral that is the most suitable non-synthetic, natural filtering aid that is used to remove certain impurities from organic syrup sweeteners. There is no suitable natural or organic alternative filtering aid that provides same filtering function in the production of the organic syrup products listed above.

Without bentonite, those organic syrup sweeteners and all the organic products made with them could not be produced. Bentonite should remain on the National List under Section § 205.605 as an ingredient allowed in or on processed products labeled as "organic."

Sincerely,

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Global Organics, Ltd. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material:

Enzymes, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." Enzymes are used to produce organic syrup sweeteners by hydrolyzing various starches into sugars and inverting sugar into invert sugars (fructose and dextrose).

Global Organics is a handler of wholesale organic ingredients and distributes a full line of organic syrups made from organic tapioca starch, wheat starch, rice starch, malted barley starch, corn starch, spelt starch and organic cane sugar.

The enzyme is the natural substance that converts various starches into sugars. There are various synthetic alternatives to facilitate the hydrolysis of the starches which are not suitable for nor compatible with organic production. In addition, enzymes are used to invert organic sugar (sucrose) into invert syrup, another organic liquid sweetener. There are no suitable non-synthetic, natural alternatives to enzymes that can be used to produce organic syrup sweeteners.

The organic liquid sweeteners produced using enzymes are used in many different food products applications especially organic baked goods and energy bars. The organic syrups have unique flavors and handling characteristics and are also valued as alternative sweeteners to organic sugar. Without enzymes, those organic syrups could not be produced with the desired characteristics.

Without enzymes, many organic syrup sweeteners and all the organic products made with with those sweeteners could not be produced. Enzymes should remain on the National List under Section § 205.605 as an ingredient allowed in or on processed products labeled as "organic."

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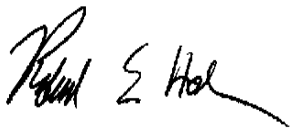

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Global Organics, Ltd. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material:

Calcium hydroxide, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." This substance is a processing aid in the production of organic cane sugar.

Global Organics is a handler of wholesale organic ingredients and is one of the largest distributors of organic cane sugar worldwide.

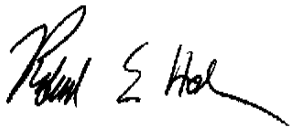
Calcium hydroxide, made by adding water to calcium oxide, "lime", is the main processing aid required for the production of organic cane sugar. Calcium hydroxide is added directly to the freshly crushed sugarcane juice in the *clarification* stage of cane sugar production. In the cane juice, the calcium hydroxide causes the non-sugar solids and impurities to precipitate out of solution to the bottom of decantation tank. Since it bonds to the impurities, the calcium hydroxide is removed from the cane juice along with the "mud" at the bottom of the decanter, and therefore is not present in the final organic sugar.

Clarification of organic sugarcane juice is not possible without calcium hydroxide. Organic crystalline sugar of adequate quality cannot be produced without the use of calcium hydroxide, since there is no suitable alternative processing aid.

In addition, please note that calcium hydroxide is permitted for use in the production of organic sugar under European Union regulation number 2092/91. The removal of calcium hydroxide from the National List and the resulting incompatibility between organic standards would all but eliminate the export of "organic", sugar-containing products to the EU, the largest export market for US produced multi-ingredient products.

Without calcium hydroxide, organic sugar and all the organic products made with organic sugar could not be produced. Calcium hydroxide should remain on the National List under Section § 205.605 as an ingredient allowed in or on processed products labeled as "organic."

Sincerely,



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Global Organics, Ltd. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material:

Potassium Carbonate, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." This substance is used as an alkalizing agent in the production of organic Dutch cocoa powder.

Global Organics is a handler of wholesale organic ingredients and is one of the largest US distributors of organic Dutch and organic "natural" cocoa powder. All of our chocolate products including organic cocoa powders are made to order by an organic chocolate factory in Europe.

Potassium carbonate is the main processing aid required for the production of organic Dutch cocoa. As an alkalizer, potassium carbonate reduces the acidity of cocoa powder to make it more pH neutral. This "Dutch" process enriches the cocoa flavor, darkens the cocoa color and makes the cocoa easier to mix in most liquids. All three of the characteristics are valued by our customers who use our organic Dutch cocoa in a wide range of products from drink mixes and syrups, to cake mixes and other baked goods. Without potassium carbonate, Dutch cocoa could not be produced with the desired characteristics.

While organic natural cocoa powder is similar in its appearance and source, it is not a suitable alternative for Dutch cocoa. Global Organics sells a significant quantity of organic natural cocoa powder, but it's different handling and organoleptic qualities make it a distinctly different ingredient. In certain products, such as drink mixes, there is no suitable alternative to Dutch cocoa powder processed with potassium carbonate.

Without potassium carbonate, Dutch cocoa powder and all the organic products made with organic Dutch cocoa powder could not be produced. Potassium carbonate should remain on the National List under Section § 205.605 as an ingredient allowed in or on processed products labeled as "organic."

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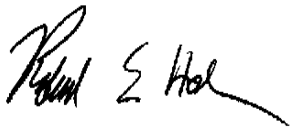

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